

FILED ENTERED
LODGED RECEIVED

APR 13 2012

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

HERBCO INTERNATIONAL INC.,
EDWARD WILLIAMSON ANDREWS, III,
DAVID WILLIAM LYKINS, JR., and
DEBRA RAE HOWARD,

Defendants.

NO. CR12- 100 RSM
INFORMATION

U.S.C. Title 8, Sections
1324(a)(1)(A)(iii) & (iv)
Harboring Alien; Encourage,
Induce Alien to Reside

U.S.C. Title 8 Sections 1324(a)(2)
and (f); U.S.C. Title 18
Section 2 (Aid and Abet
Continued Employment of Illegal
Alien)

(Felony and Misdemeanor)

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT I

On or about April 22, 2011, at Duvall, within the Western District of Washington,
HERBCO INTERNATIONAL INC., a Washington corporation, by and through acts of
its employees, acting in the scope of their employment and, in part, to benefit the
corporation, harbored, concealed, and shielded from detection an alien, MAC, a citizen

//

//

INFORMATION:

HERBCO INTERNATIONAL, INC.;
EDWARD WILLIAMSON ANDREWS, III;
DAVID WILLIAM LYKINS, JR.;
DEBRA RAE HOWARD - 1

UNITED STATES ATTORNEY
700 Stewart Street, Suite 5220
Seattle, Washington 98101-1271
(206) 553-7970

1 and national of Mexico, while knowing and in reckless disregard of the fact the alien had
2 come to, entered, or remained in the United States in violation of law.

3 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

4 COUNT II

5 On or about April 22, 2011, at Duvall, within the Western District of Washington,
6 HERBCO INTERNATIONAL INC., a Washington corporation, by and through acts of
7 its employees, who acted in the scope of their employment and, in part, to benefit the
8 corporation, encouraged and induced an alien, MAC, a citizen and national of Mexico, to
9 reside in the United States while knowing or in reckless disregard of the fact the alien's
10 residence in the United States was in violation of law.

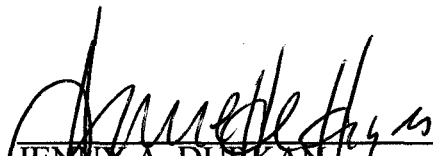
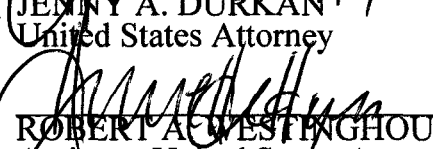
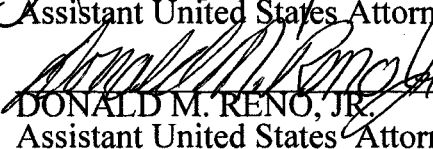
11 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iv).

12 COUNT III

13 On or about April 22, 2011, through June 30, 2011 at Duvall, within the Western
14 District of Washington, EDWARD WILLIAMSON ANDREWS, III, DAVID WILLIAM
15 LYKINS, JR., and DEBRA RAE HOWARD, knowing that MAC, a citizen and national
16 of Mexico, was not authorized to be employed in the United States, continued to employ
17 him and other unauthorized aliens at HERBCO INTERNATIONAL INC.

18 All in violation of Title 8, United States Code, Section 1324a(a)(2) and (f) and
19 Title 18, United States Code, Section 2.

20 DATED this 3rd day of April, 2012.

21 
22 JENNY A. DURKAN
23 United States Attorney
24 
25 ROBERT A. WESTINGHOUSE
26 Assistant United States Attorney
27 
28 DONALD M. RENO, JR.
Assistant United States Attorney

29 INFORMATION:
30 HERBCO INTERNATIONAL, INC.;
31 EDWARD WILLIAMSON ANDREWS, III;
32 DAVID WILLIAM LYKINS, JR;
33 DEBRA RAE HOWARD - 2